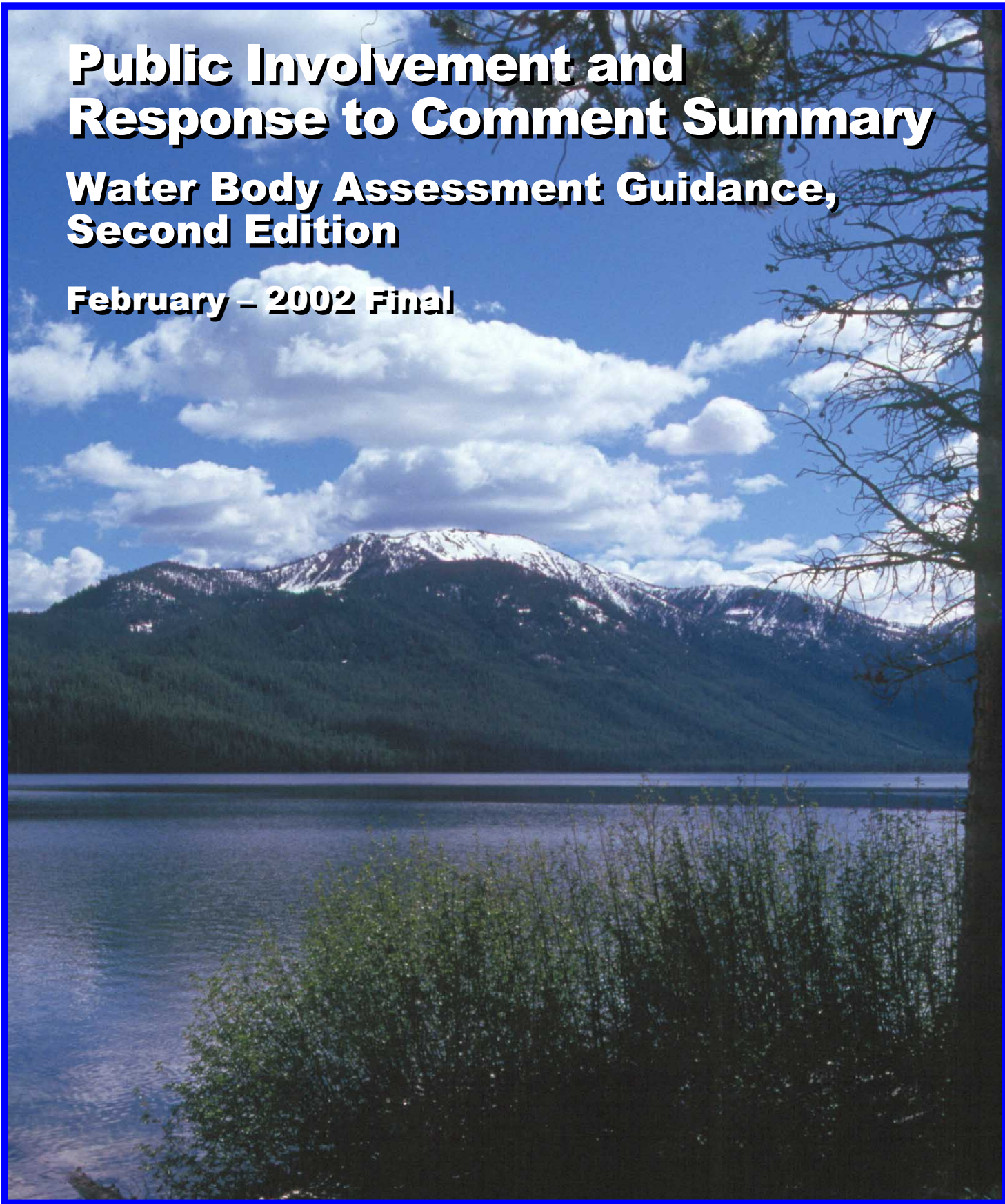


Public Involvement and Response to Comment Summary

Water Body Assessment Guidance, Second Edition

February – 2002 Final



Idaho Department of Environmental Quality



PUBLIC INVOLVEMENT AND RESPONSE TO COMMENT SUMMARY

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Acronyms

<u>Acronym</u>	<u>Explanation</u>
ADB	Assessment Database
ALUS	Aquatic Life Use Support
ARC/IMS	ArcView Internet Map Server
BURP	Beneficial Use Reconnaissance Program
CALM	Consolidated Assessment and Listing Methodology
cfs	Cubic feet per second
CWA	Clean Water Act
CW ALUS	Cold Water Aquatic Life Use Support
CWE	Cumulative Watershed Effects
DEQ	Idaho Department of Environmental Quality
DO	Dissolved oxygen
EMAP	Environmental Monitoring and Assessment Program
EPA	Environmental Protection Agency
ESA	Endangered Species Act
fs	Feet per second
FS	Fully supporting
GIS	Geographic Information System
GPS	Global Positioning System
HUC	Hydrologic unit codes
IDFG	Idaho Department of Fish and Game
IDWR	Idaho Department of Water Resources
ISU	Idaho State University
m	Meter

<u>Acronym</u>	<u>Explanation</u>
MDAT	Daily Average Temperatures
MDMT	Daily Maximum Temperatures
mg/l	Milligrams per liter
mm	Millimeter
NA	Not assessed
NAWQA	National Water Quality Assessment Program
NCDC	National Climatic Data Center
NFS	Not fully supporting
NPDES	National Pollutant Discharge Elimination System
ODEQ	Oregon Department of Environmental Quality
ORW	Outstanding Resource Water
OWQI	Oregon Water Quality Index
PCR	Primary Contact Recreation
PFC	Proper Functioning Condition
QA	Quality assessment
QC	Quality control
RBP	Rapid Bioassessment Protocol
RDI	River Diatom Index
RFI	River Fish Index
RMI	River Macroinvertebrate Index
RPI	River Physicochemical Index
SCR	Secondary Contact Recreation
SFI	Stream Fish Index
SHI	Stream Habitat Index
SMI	Stream Macroinvertebrate Index
SRW	Special Resource Waters
SWAP	Source Water Assessment Program

<u>Acronym</u>	<u>Explanation</u>
TDG	Total dissolved gas
TMDL	Total maximum daily load
USFS	United States Forest Service
USGS	United States Geological Survey
WBAG II	Water Body Assessment Guidance – Second Edition
WBID	Water Body Identification System
WET	Whole effluent toxicity
WQS	Water Quality Standard

Executive Summary

The Department of Environmental Quality (DEQ) began requesting public comment on the Water Body Assessment Guidance, Second Edition (WBAG II) and supporting technical documents (Grafe 2000a, 2000b) on February 1, 2001. The WBAG II describes DEQ's methods used to evaluate data and determine beneficial use support of Idaho water bodies. After the public comment period ended on June 1, 2001 (120 day public comment period), DEQ reviewed comments, revised the WBAG II appropriately, and prepared responses to comments. This Public Involvement and Response to Comment Summary reports the results of those efforts.

The activities conducted by DEQ to obtain public input are described in Section 1. To assist in soliciting public comments, DEQ provided the WBAG II in both electronic and hard copy formats at DEQ's website, regional offices, the Idaho State Library, regional libraries, and for any public request. DEQ advertised its request for comments in 17 newspaper publications statewide, conducted pre-workshop interviews to identify key water body assessment issues in particular areas of the state, and held educational and post-comment workshops throughout the state. DEQ's summary of workshop comments and corresponding responses are listed in Appendix E.

Section 2 provides a table of written comments submitted to DEQ except those from EPA. The table lists DEQ's corresponding responses and any resulting changes to the WBAG II. The comments are identified by a correspondence I.D. number (assigned in Appendix F), and are organized in Section 2 by comment subject. EPA's comments and correspondence with DEQ regarding the WBAG II can be found in Appendix G. Interested parties can obtain a complete list of comments sorted by commenter, or correspondence I.D. number, from the DEQ website: <http://www2.state.id.us/deq> or by contacting Cyndi Grafe at (208) 373-0163 or cgrafe@deq.state.id.us.

Section 3 is a summary of important changes to the final WBAG II. Most WBAG II sections were revised, including the addition of a new section (Section 3, WBAG II) addressing the identification of beneficial uses for assessment. Additionally, DEQ clarified policies concerning the use of outside data, DEQ's tiered approach, and evaluation of criteria exceedances. Some of the most significant changes to the WBAG II relate to different scoring for all the stream indexes and the elimination of the overwhelming score approach for the stream index data integration.

Section 1. Public Information and Involvement

1.1. Introduction

On February 1, 2001, the Idaho Department of Environmental Quality (DEQ) requested public comment on the revised Water Body Assessment Guidance, Second Edition (WBAG II) and supporting technical documents (Grafe 2000a, 2000b). The WBAG II described DEQ's standardized process to evaluate data and determine beneficial use support of Idaho water bodies. The guidance also included DEQ policies for interpreting and implementing state and federal regulations.

With respect to public involvement, DEQ usually solicits public comments for 30 days. Due to the technical nature of the assessment process, however, DEQ took several additional steps to notify the public, explain the process, answer questions, and gather useful comments to improve WBAG II. Section 1.2 describes the overall approach to DEQ's public involvement strategy.

1.2. Approach

DEQ used several different approaches to ensure the public had an opportunity to learn about the assessment process and provide valuable input. Some efforts such as holding a public comment period and posting newspaper advertisements are customary DEQ public process protocols. However, DEQ took extra steps to supplement these common approaches and added new methods to improve understanding of the DEQ surface water program and in particular, the water body assessment process. These efforts included sending individual invitations to interested parties and holding educational workshops. The following summaries describe the WBAG II public involvement process in detail.

1.2.1. Extended Public Comment Period

DEQ held a much longer public comment period than the typical 30 days. The advertised public comment period was initially set for February 1 through May 1, 2001 (90 days). However, DEQ extended the comment period an additional 30 days to encourage as many comments as possible. The extension also allowed time after the educational workshops for additional comment.

1.2.2. Extensive Document Distribution

Circulation of draft documents went beyond conventional distribution. DEQ provided the documents in hard copy and electronic formats. Statewide distribution of hard copies included DEQ regional offices, the Idaho State Library, designated regional libraries, and any public requests. DEQ also furnished the documents electronically in Adobe Acrobat (.pdf) format on compact discs (CDs) and on the DEQ website: <http://www2.state.id.us/deg>. Additional CDs were distributed at the educational workshops and were available upon request.

1.2.3. Invitation Letter to Interested Parties

DEQ further generated interest in the public comment period by inviting interested parties to obtain the WBAG II documents, attend an educational workshop, and comment on the proposed assessment process. Appendix A provides an example of the invitation letter and information enclosure.

1.2.4. Public Announcements

As previously noted, DEQ advertised in several newspapers statewide announcing the public comment period. Table 1-1 lists the newspapers that carried the notices during the beginning of each month of the public comment period. Figure 1-1 shows an example of the newspaper announcement.

Table 1-1. List of newspapers carrying WBAG ad

Bonner County Daily Bee	Lewiston Morning Tribune	Spokesman Review
Challis Messenger	Moscow-Pullman Daily News	Star News
Coeur d'Alene Press	Mountain Home News	Times News
Idaho Press Tribune	Post Register	Weiser Signal American
Idaho State Journal	Recorder-Herald	Wood River Journal
Idaho Statesman	South Idaho Press	

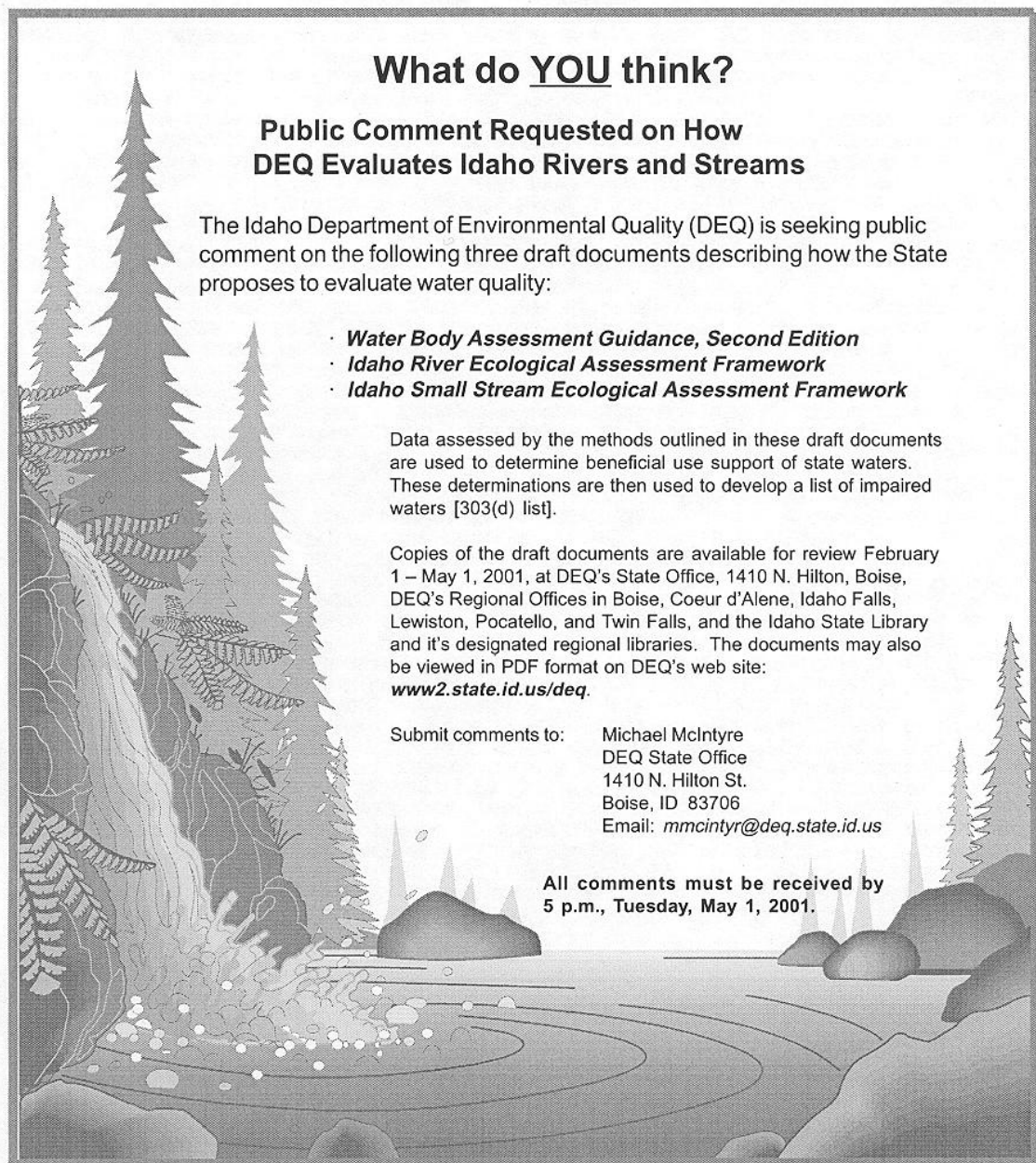


Figure 1-1. Example of WBAG II Public Announcement

1.2.5. Educational Workshops

Due to the technical nature of the WBAG, DEQ hosted a series of educational workshops to explain the assessment process, answer questions, and encourage useful comments to improve WBAG II. DEQ contracted with EnviroIssues to develop and facilitate the workshops. These educational workshops generated awareness among key stakeholders and were designed to meet the following goals:

- Engage stakeholders in an early and open process
- Introduce key concepts of the WBAG process
- Facilitate a better understanding of the WBAG
- Solicit useful WBAG input
- Achieve a better water body assessment process in Idaho

1.2.5.1. Pre-Workshop Interviews

To understand key WBAG II issues prior to the workshop, EnviroIssues conducted over 30 interviews of individuals representing the following interest groups:

- Watershed Advisory Groups
- Industry
- Environmental Groups
- Tribes
- U.S. Environmental Protection Agency
- Bureau of Land Management
- U.S. Forest Service
- Regional DEQ employees
- Other state agencies

It is important to note that these pre-workshop interviews were designed to identify key issues for workshop purposes only. To obtain actual public comment, DEQ requested feedback during the workshops and submittal of written comments. Appendix B provides a list of individuals interviewed to develop the top issues addressed in the workshop presentations.

1.2.5.2. Workshop Times and Locations

DEQ held workshops in three different geographic locations to encourage statewide participation. These workshops were held in Moscow (April 24, 2001), Boise (May 2, 2001), and Pocatello (May 8, 2001). Additionally, DEQ held a separate workshop in Worley (May 17, 2001) specifically for the Idaho Tribes.

1.2.5.3. Workshop Content

Table 1-2 presents an example agenda of the workshop framework. The workshop was organized to present the background and history of the WBAG as well as the surface water program goals. This set the foundation for the rest of the presentations concerning the current status of the WBAG and its new elements.

Table 1-2. Example of Workshop Agenda

Time	Agenda Topic
8:30AM – 9:00AM	Open House, Meet and Greet
9:00AM – 9:20AM	Introductions, Ground Rules, Agenda Review
9:20AM – 10:00AM	WBAG Background and History/Q&A
10:00AM – 11:00AM	WBAG II Current Status/Q&A
11:00AM – 11:15AM	Break
11:15AM – 12:00PM	Example of Local WBAG II Application/Q&A
12:00PM – 1:00PM	Lunch – On Your Own
1:00PM – 2:30PM	Key WBAG II Technical Considerations/Q&A
2:30PM – 2:45PM	Break
2:45PM – 3:15PM	Additional Example of Local WBAG II Application/Q&A
3:15PM – 4:15PM	Additional Q&A Time, Recommendations from Workshop Attendees
4:15-4:30PM	Wrap Up Discussion

Additionally, DEQ presented examples of the WBAG process by using actual data from one to two streams. In the examples, each step referenced specific WBAG guidance. By using real data, the workshop participants were able to more fully understand the WBAG process.

Once the audience was familiar with the WBAG process, DEQ then addressed key issues identified during pre-workshop interviews. These issues related to the following:

- Validity of Indexes
- Reference Conditions
- Performance of Macroinvertebrate Index in Northern Mountains Ecoregion
- Native and Introduced Fish Species
- Treatment of Habitat Index
- Use of Outside Data
- Data Representativeness

1.2.5.4. Workshop Informational Handout – Frequently Asked Questions

To highlight changes in the WBAG and improve comprehension of the process, EnviroIssues prepared a 10-page document entitled “Frequently Asked Questions.” The handout covered everything from details of the public comment process to policy highlights. Appendix C provides a copy of this document.

1.2.5.5. Workshop Results

DEQ was very pleased with the participation and feedback achieved at the workshops. Appendix D provides a list of workshop attendees. While facilitating the Moscow, Boise, and Pocatello workshops, EnviroIssues noted key issues and recommendations from participants. Appendix E provides a synthesis of these issues and recommendations from the three workshops. Most of the workshop concerns are addressed in DEQ’s response to written comments in Section 2. To reduce confusion, DEQ has addressed EnviroIssues’ summary of workshop comments, in Table E-1, separate from written comments submitted during the public comment period.

1.2.6. Post-Comment Workshops

After the close of the public comment period, DEQ used public input to revise the WBAG II extensively (see Section 3). DEQ held follow-up workshops to educate Basin Advisory Groups, the Tribes, EPA, and others on how the WBAG was modified, demonstrate the application of the WBAG, and respond to any remaining concerns. As of the date of this document, DEQ had held the following post-comment workshops:

- EPA, Region 10, Seattle, Washington: January 10, 2002
- Panhandle Basin Advisory Group, Coeur d’Alene, Idaho: January 15, 2002
- Southwest Basin Advisory Group, Boise, Idaho: January 17, 2002
- Northern Idaho Tribes, Worley, Idaho: February 6, 2002
- Clearwater Basin Advisory Group, Lewiston, Idaho: February 7, 2002